UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA)	
vs.)))	CASE NO.: 24-CR-80052
TIMOTHY MARIS,)	
Defendant.)	
)	

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE

By and through his counsel of record, Timonthy Maris respectfully moves to continue the Trial and avers as follows:

- 1. This matter is currently set for Status Conference on May 15, 2024, at 10:00 am.
- 2. Undersigned just received a significant amount of discovery (over 1,000 documents) and is beginning to review same.
- 3. Additionally, undersigned and AUSA Gregory Schiller are actively discussing a potential resolution, short of a trial.
- 4. Both undersigned and the Government would greatly benefit from a continuance affording additional time to negotiate a potential resolution.
- 5. The Government has no objection to undersigned's request for a continuance with an additional 60 days to possibly negotiate a plea agreement.
- 6. Additionally, undersigned has a conflict on May 15, 2024, and was hoping that if this matter remained on the calendar, that undersigned could appear telephonically or via Zoom.
- 7. AUSA Gregory Schiller has no objection to this motion.
- 8. This motion is not for the purpose of unnecessary delay.

WHEREFORE, based upon the above and foregoing the Defendant respectfully requests this Court to grant the instant motion.

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed this 6th day of May, 2024.

Respectfully submitted, LAW OFFICES OF MARK EIGLARSH 3107 Stirling Road Suite 207 Fort Lauderdale, Florida 33312

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BY: <u>/S/_MARK EIGLARSH</u>_

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